

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WILLIAM S. DAVIS,)	
)	
Plaintiff,)	No. 1:19-cv-08080
)	
v.)	Assigned Judge: Hon. Manish S. Shah
)	
HOMETOWN NATIONAL BANK and)	
EXPERIAN INFORMATION)	
SOLUTIONS, INC.,)	
)	
Defendants.)	

**FIRST AMENDED REQUEST TO ADMIT FACTS AND GENUINENESS OF
DOCUMENTS TO PLAINTIFF, WILLIAM S. DAVIS**

WARNING: IF YOU FAIL TO SERVE THE RESPONSE REQUIRED BY RULE 216 WITHIN 28 DAYS AFTER YOU ARE SERVED WITH THIS DOCUMENT, ALL THE FACTS SET FORTH IN THE REQUESTS WILL BE DEEMED TRUE AND ALL THE DOCUMENTS DESCRIBED IN THE REQUESTS WILL BE DEEMED GENUINE.

Now comes certain Defendant, Hometown National Bank, by and through its attorneys, Herbolsheimer, Duncan, Eiten, Hintz, and Klinefelter, P.C., William P. Hintz of counsel, and hereby serves upon the Plaintiff, William S. Davis, the following Request to Admit. Plaintiff is requested to respond to the request within 30 days.

1. Admit that the information in attached document with the control number ending 43001 was accurate on the date it was submitted, June 26, 2018.

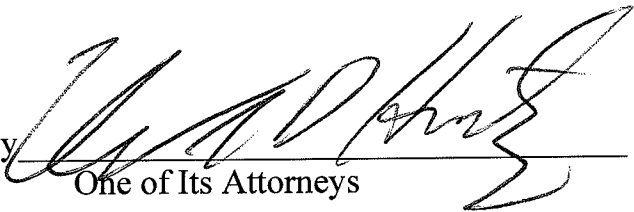
2. Admit that the information in the attached document with the control number ending 49001 was accurate on the date it was submitted, September 26, 2018.

3. Admit that the information in the attached document with the control number ending 30102 was accurate on the date it was submitted, July 5, 2018.

4. Admit that the information in the attached document with the control number ending 30101 was accurate on the date it was submitted, July 5, 2018.

5. Admit that the information in the attached document with the control number ending 61079 was accurate on the date it was submitted, June 8, 2018.

Hometown National Bank,

By 
One of Its Attorneys

William P. Hintz
Attorney at Law
ARDC No. 6185407
Herbolsheimer, Duncan,
Eiten, Hintz, and Klinefelter, P.C.
654 First Street, Suite 400
LaSalle, IL 61301
Telephone: (815) 223-0111
whintz@hlhdr.com

Experian 691 Experian Pkwy, Allen, TX, 75013	Control #: 2883636743001
FAX #:	FCRA Response Due Date: 06-29-2018
Account Number: 26060000000010	Response Date:
Subscriber Code: Hometown National Bank/2109780	Response Code: 22: Updated disputed account information. Additional account information was also updated.

On the lines below, S indicates the Response element is the Same as in the Request; D indicates it is Different, and U indicates it is Unknown.

Request Data		Verif Ind	Response Data								
First Name:	WILLIAM	S	First Name:	WILLIAM							
Middle Name:	S	S	Middle Name:	S							
Last Name:	DAVIS	S	Last Name:	DAVIS							
Generation Code:		U	Generation Code:								
Address:	3705 HIGHWAY 8 WEAT, MENA, AR, 71953	S	Address:								
Prev First Name:		U	Prev First Name:								
Prev Middle Name:		U	Prev Middle Name:								
Prev Last Name:		U	Prev Last Name:								
Prev Generation Code:			Prev Generation Code:								
Prev. Address:		U	Prev. Address:								
SSN:	[REDACTED]	S	SSN:	[REDACTED]							
DOB:	[REDACTED]	S	DOB:	[REDACTED]							
Telephone Number:		U	Telephone Number:								
2 nd Prev. Address:											
Consumer States/Comments:											
Dispute Code 1:	112: Consumer states inaccurate information. Provide or confirm complete ID and verify all Account Information.										
Dispute Code 2:											
FCRA Relevant Information:		THIS PROPERTY WAS FORGIVEN UPON DECEMBER OF 2013. I HAVE COURT DOCUMENTATION VERIFYING SAID TRANSACTION.									
Account Status	Pay. Rate	MOP	Cond./Cumm. Status	Date Opened	Balance	Amount Past Due	High Cr./Org.	Credit Limit	Original Charge-Off Amount		
84			OPEN/OLD LIST	10-26-2007	\$14472	\$14632	\$13373				
94				10-26-2007	\$0	\$0	\$13373				
Account Type	Interest Type	Port. Type	Term Dur.	Freq.	Date of Account Information	Date Closed	Date of Last Payment	Sch. Payment	ECOA	CII	FCRA DOFD
5A				M	05-31-2018		09-29-2011	\$161	1		
5A		M			06-10-2018	12-27-2013	09-29-2011		1		09-01-2011
Compliance Condition Code	SCC	Original Cr. Name			Original Cr. Class	Spec. Payment Ind.	Deferred Start Date	Balloon Date	Balloon Amount		
		HOMETOWN NATIONAL BANK			08						
Agency ID	Sec. Marketing Agency Account #	Mortgage ID		Actual Payment	Portfolio Indicator	Purchased from/Sold to					
Remarks:						DF Contact #: (815) 223-7300					

Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2018											6	6
2017	6	6	6	6	6	6	6	6	6	6	6	6
2016	6	6	6	6	6	6	6	6	6	6	6	6
2015	6	6	6	6	6	6	6	6	6	6	6	6
2014	6	6	6	6	6	6	6	6	6	6	6	6
2013	6	6	6	6	6	6	6	6	6	6	6	6
2012	6	6	6	6	6	6	6	6	6	6	5	4
2011	3	2	1	1	0	0	0					

Account History - Response

Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2018								0	0	0	0	0
2017	0	0	0	0	0	0	0	0	0	0	0	0
2016	0	0	0	0	0	0	0	0	0	0	0	0
2015	0	0	0	0	0	0	0	0	0	0	0	0
2014	0	0	0	0	0	0	0	0	0	0	0	0
2013	6	6	6	6	6	6	6	6	6	6	6	6
2012	6	6	6	6	6	6	6	6	6	6	5	4
2011	3	2	1	1	0	0	0					

Associated Consumer 1				Associated Consumer 2			
Name:				Name:			
Address:				Address:			
SSN:		DOB:		SSN:		DOB:	
Telephone Number:				Telephone Number:			
ECOA/Consumer Information Indicator: /				ECOA/Consumer Information Indicator: /			
Images Information							
Associated Images:		No	Image Access Indicators:	#1	#2	#3	#4

Submitted By: chris wren

(85) 223-7300

Date: 06-26-2018

By submitting this ACDV, you certify that you have reviewed and considered all associated images you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.

DRAFT

Experian
601 Experian Pkwy, Allen, TX, 75013Data Received: 05/12/2018
Control #: 1145266149001

FAX #:

FCRA Response Due Date: 10-05-2018

Account Number: 600011340000000050

Response Date:

Subscriber Code: Hometown National Bank/2109780

Response Code: 22-Updated disputed account information. Additional account information was also updated.

On the lines below, S indicates the Response element is the Same as in the Request; D indicates it is Different, and U indicates it is Unknown.

Request Data

Verif Ind

Response Data

First Name: WILLIAM

S

First Name:

Middle Name:

U

Middle Name:

Last Name: DAVIS

S

Last Name:

Generation Code:

U

Generation Code:

Address: 3705 W HIGHWAY 8,MENA,AR,71953

S

Address:

Prev First Name:

U

Prev First Name:

Prev Middle Name:

U

Prev Middle Name:

Prev Last Name:

U

Prev Last Name:

Prev Generation Code:

Prev Generation Code:

Prev. Address:

D

Prev. Address: 2315 First Street, Peru, IL, 61354

SSN:

S

SSN:

DOB:

S

DOB:

Telephone Number:

Telephone Number:

2nd Prev. Address: -

Consumer States/Comments:

Dispute Code 1: 106:Disputes present/previous Account Status/Payment Rating/Account History. Verify Account Status, Payment Rating and Account History.

Dispute Code 2:

FCRA Relevant Information:

NEVER LATE/CURR ACCO ACT. DT:09/13/2018

Account Status	Pay. Rate	MOP	Cond./Cumm. Status	Date Opened	Balance	Amount Past Due	High Cr./Org.	Credit Limit	Original Charge-Off Amount		
84			OPEN/09/13/2018	12-23-2005	\$110209	\$63289	\$84500				
94	L			12-23-2005	\$0	\$0	\$84500				
Account Type	Interest Type	Port. Type	Term Dur.	Freq.	Date of Account Information	Date Closed	Date of Last Payment	Sch. Payment	ECOA	CII	FCRA DOFD
26				M	08-31-2018		08-08-2011	\$843	1		
26		M	30	M	09-01-2018		08-08-2011	\$843	1		09-01-2011
Compliance Condition Code	SCC	Original Grantee	Original Cr. Class	Spec. Payment Ind.	Deferred Start Date	Balloon Date	Balloon Amount				
		Hometown National Bank	08								
Agency ID	Sec. Marketing Agency Account #	Mortgage ID	Actual Payment	Portfolio Indicator	Purchased from/Sold to						
Remarks:					DF Contact #: (815) 220-2221						

FAX #:

FCRA Response Due Date: 07-05-2018

Account Number: 26060000000010

Response Date:

Subscriber Code: Hometown National Bank/559BB07406

Response Code: 22: Updated disputed account information. Additional account information was also updated.

On the lines below, S indicates the Response element is the Same as in the Request; D indicates it is Different, and U indicates it is Unknown.

Request Data		Verif Ind	Response Data								
First Name:	WILLIAM	S	First Name:	WILLIAM							
Middle Name:	S	S	Middle Name:	S							
Last Name:	DAVIS	S	Last Name:	Davis							
Generation Code:			Generation Code:								
Address:	3705 HIGHWAY 8 W, MENA, AR, 71953	S	Address:								
Prev First Name:	SCOTT	S	Prev First Name:	SCOTT							
Prev Middle Name:			Prev Middle Name:								
Prev Last Name:	DAVIS	S	Prev Last Name:	DAVIS							
Prev Generation Code:			Prev Generation Code:								
Prev. Address:	2315 1ST ST, PERU, IL, 61354	S	Prev. Address:								
SSN:	[REDACTED]	S	SSN:	[REDACTED]							
DOB:	[REDACTED]	S	DOB:	[REDACTED]							
Telephone Number:			Telephone Number:	[REDACTED]							
2 nd Prev. Address:	135 WALKER FARM LN, MENA, AR, 71953										
Consumer States/Comments:											
Dispute Code 1:	106: Disputes present/previous Account Status/Payment Rating/Account History. Verify Account Status, Payment Rating and Account History.										
Dispute Code 2:											
FCRA Relevant Information:		IMAGE ATTACHED									
Account Status	Pay. Rate	MOP	Cond./Cumm. Status	Date Opened	Balance	Amount Past Due	High Cr./Org.	Credit Limit	Original Charge-Off Amount		
84			-	10-26-2007	\$14472	\$14632	\$13373				
94				10-26-2007	\$0	\$0	\$13373		\$13373		
Account Type	Interest Type	Port. Type	Term Dur.	Freq.	Date of Account Information	Date Closed	Date of Last Payment	Sch. Payment	ECOA	CII	FCRA DOFD
08		M		M	05-31-2018		09-01-2011	\$161	1		09-01-2011
08		M			07-01-2018	12-27-2013	09-29-2011		1		09-01-2011
Compliance Condition Code		SCC	Original Charge-Off			Original Cr. Class	Spec. Payment Ind.	Deferred Start Date	Balloon Date	Balloon Amount	
			Hometown National Bank			08					
Agency ID	Sec. Marketing Agency Account #		Mortgage ID			Actual Payment	Portfolio Indicator		Purchased from/Sold to		
02											
Remarks:									DF Contact #: (815) 220-2221		

Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2018	6	6	6	6	6	6	6	6	6	6	6	6
2017	6	6	6	6	6	6	6	6	6	6	6	6
2016	6	6	6	6	6	6	6	6	6	6	6	6
2015	6	6	6	6	6	6	6	6	6	6	6	6
2014	6	6	6	6	6	6	6	4	4	4	4	4
2013	4	4	4	4	4	4	4	4	4	4	4	4
2012	4	4	4	4	4	4	4	4	4	4	4	4
2011	3	2	1	B	-	-	-	-	-	-	-	-

Account History - Response												
Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2018	0	0	0	0	0	0	0	0	0	0	0	0
2017	0	0	0	0	0	0	0	0	0	0	0	0
2016	0	0	0	0	0	0	0	0	0	0	0	0
2015	6	0	0	0	0	0	0	0	0	0	0	0
2014	0	0	0	0	0	0	0	0	0	0	0	0
2013	0	4	4	4	4	4	4	4	4	4	4	4
2012	4	4	4	4	4	4	4	4	4	4	4	4
2011	3	2	1	B	-	-	-	-	-	-	-	-

Associated Consumer 1				Associated Consumer 2			
Name:				Name:			
Address:				Address:			
SSN:		DOB:		SSN:		DOB:	
Telephone Number:				Telephone Number:			
ECOA/Consumer Information Indicator: /				ECOA/Consumer Information Indicator: /			
Images Information							
Associated Images:		Yes	Image Access Indicators:		#1	#2	#3

Submitted By: chris wren

781-223-7300

Date: 07-05-2018

By submitting this ACDV, you certify that you have reviewed and considered all associated images and you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.

FAX #:

FCRA Response Due Date: 07-05-2018

Account Number: 600011340000000050

Response Date:

Subscriber Code: Hometown National Bank/559BB07406

Response Code: 22: Updated disputed account information. Additional account information was also updated.

On the lines below, S indicates the Response element is the Same as in the Request; D indicates it is Different, and U indicates it is Unknown.

Request Data		Verif Ind	Response Data						
First Name:	WILLIAM	S	First Name:	WILLIAM					
Middle Name:	S	S	Middle Name:	S					
Last Name:	DAVIS	S	Last Name:	DAVIS					
Generation Code:		U	Generation Code:						
Address:	3705 HIGHWAY 8 W, MENA, AR, 71953	S	Address:	3705 HIGHWAY 8 W, MENA, AR, 71953					
Prev First Name:	SCOTT	S	Prev First Name:	SCOTT					
Prev Middle Name:		U	Prev Middle Name:						
Prev Last Name:	DAVIS	S	Prev Last Name:	DAVIS					
Prev Generation Code:			Prev Generation Code:						
Prev. Address:	2315 1ST ST, PERU, IL, 61354	S	Prev. Address:						
SSN:	[REDACTED]	S	SSN:	[REDACTED]					
DOB:	[REDACTED]	S	DOB:	[REDACTED]					
Telephone Number:			Telephone Number:	[REDACTED]					
2 nd Prev. Address:	135 WALKER FARM LN, MENA, AR, 71953								
Consumer States/Comments:									
Dispute Code 1:	106: Disputes present/previous Account Status/Payment Rating/Account History. Verify Account Status, Payment Rating and Account History.								
Dispute Code 2:									
FCRA Relevant Information:		IMAGE ATTACHED							
Account Status	Pay Rate	MOP	Cond./Cumm. Status	Date Opened	Balance	Amount Past Due	High Cr./Org.	Credit Limit	Original Charge-Off Amount
84				12-23-2005	\$108985	\$60899	\$84500		
94				12-23-2005	\$0	\$0	\$108985		
Account Type	Interest Type	Port. Type	Term Dur.	Freq.	Date of Last Payment	Sch. Payment	ECOA	CII	FCRA DOFD
08		M		M	05-31-2018	\$843	1		03-01-2012
08		M		M	07-01-2018				03-01-2012
Compliance Condition Code	SCC	Original Charge-Off			Original Cr. Class	Spec. Payment Ind.	Deferred Start Date	Balloon Date	Balloon Amount
HOMETOWN NATIONAL BANK					08				
Agency ID	Sec. Marketing Agency Account #		Mortgage ID		Actual Payment	Portfolio Indicator	Purchased from/Sold to		
02									
Remarks: FREDDIE MAC ACCOUNT							DF Contact #: (815) 220-2221		

Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2018											6	6
2017	6	6	6	6	6	6	6	6	6	6	6	6
2016	6	6	6	6	6	6	6	6	6	6	6	6
2015	6	6	6	6	6	6	6	6	6	6	6	6
2014	6	6	6	6	6	6	6	4	4	4	4	4
2013	4	4	4	4	4	4	4	4	4	4	4	4
2012	4	4	4	4	4	4	4	3	2	1	B	-
2011	-	-	-	-	-	-	-	-	-	-	-	-

Account History - Response

Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2018							0	0	0	0	0	0
2017	0	0	0	0	0	0	0	0	0	0	0	0
2016	0	0	0	0	0	0	0	0	0	0	0	0
2015	0	0	0	0	0	0	0	0	0	0	0	0
2014	0	0	0	0	0	0	0	0	0	0	0	0
2013	0	4	4	4	4	4	4	4	4	4	4	4
2012	4	4	4	4	4	4	4	3	2	1	B	-
2011	-	-	-	-	-	-	-	-	-	-	-	-

Associated Consumer 1				Associated Consumer 2			
Name:				Name:			
Address:				Address:			
SSN:		DOB:		SSN:		DOB:	
Telephone Number:				Telephone Number:			
ECOA/Consumer Information Indicator: /				ECOA/Consumer Information Indicator: /			
Images Information							
Associated Images:		Yes	Image Access Indicators:	#1	#2	#3	#4

Submitted By: chris wren

1-800-553-223-7300

Date: 07-05-2018

By submitting this ACDV, you certify that you have reviewed and considered all associated Images you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.

1550 Peachtree St Atlanta, GA 30309

Control #: 99998157092561079

FAX #:

FCRA Response Due Date: 06-29-2018

Account Number: 26060000000010

Response Date:

Subscriber Code: Hometown National Bank/559BB07406

Response Code:

On the lines below, S indicates the Response element is the Same as in the Request; D indicates it is Different, and U indicates it is Unknown.

Request Data	Verif Ind	Response Data
First Name: WILLIAM		First Name:
Middle Name: S		Middle Name:
Last Name: DAVIS		Last Name:
Generation Code:		Generation Code:
Address: 3705 HIGHWAY 8 W, MENA, AR, 71953		Address:
Prev First Name: SCOTT		Prev First Name:
Prev Middle Name:		Prev Middle Name:
Prev Last Name: DAVIS		Prev Last Name:
Prev Generation Code:		Prev Generation Code:
Prev. Address: 2315 1ST ST, PERU, IL, 61354		Prev. Address:
SSN: [REDACTED]		SSN:
DOB: [REDACTED]		DOB:
Telephone Number:		Telephone Number:
2 nd Prev. Address: 135 WALKER FARM LN, MENA, AR, 71953		

Consumer Status/Comments:

Dispute Code 1: 106: Disputes present/previous Account Status/Payment Rating/Account History. Verify Account Status, Payment Rating and Account History.

Dispute Code 2:

FCRA Relevant Information:

Account Status	Pay. Rate	MOP	Cond./Cumm. Status		Date Opened	Balance	Amount Past Due	High Cr./Org.	Credit Limit	Original Charge-Off Amount	
84					10-26-2007	\$14472	\$14632	\$13373			
Account Type	Interest Type	Port. Type	Term Dur.	Freq.	Date of Account Information	Date Closed	Date of Last Payment	Sch. Payment	EOA	CII	FCRA DOFD
08		M	5	M	05-31-2018		09-01-2011	\$161	1		09-01-2011
Compliance Condition Code		SCC	Original Cr. Name			Original Cr. Class	Spec. Payment Ind.	Deferred Start Date	Balloon Date	Balloon Amount	
Agency ID	Sec. Marketing Agency Account #		Mortgage ID		Actual Payment	Portfolio Indicator	Purchased from/Sold to				
Remarks:							DF Contact #:				

Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2018	6	6	6	6	6	6	6	6	6	6	6	6
2017	6	6	6	6	6	6	6	6	6	6	6	6
2016	6	6	6	6	6	6	6	6	6	6	6	6
2015	6	6	6	6	6	6	6	6	6	6	6	6
2014	6	6	6	6	6	6	6	4	4	4	4	4
2013	4	4	4	4	4	4	4	4	4	4	4	4
2012	4	4	4	4	4	4	4	4	4	4	4	4
2011	3	2	1	B	-	-	-	-	-	-	-	-

Account History - Response												
Month	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2018												
2017												
2016												
2015												
2014												
2013												
2012												
2011												

Associated Consumer 1					Associated Consumer 2					
Name:					Name:					
Address:					Address:					
SSN:		DOB:			SSN:		DOB:			
Telephone Number:					Telephone Number:					
ECOA/Consumer Information Indicator: /					ECOA/Consumer Information Indicator: /					
Images Information										
Associated Images:	Yes	Image Access Indicators:	#1	81789014	#2		#3		#4	#5

Submitted By: BATCH BATCH

Tel#: (866) 696-7227

Date: 06-08-2018

By submitting this ACDV, you certify that you have reviewed and considered all associated Images, you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.